I am writing to provide comments to the FCC on the E-Rate NPRM, proceeding 13-184. E-Rate has been a critical component of Jackson-Madison County School System and our efforts to provide our students and teachers the access needed to online resources. These resources have increased communication, collaboration and have helped our students develop the 21st century skills necessary for their college and career paths. Seamlessly infusing digital learning throughout the curriculum is a prerequisite for students to graduate from high school with the skills and knowledge they need to succeed in today's global economy. Access to high-speed broadband is imperative to this process.

When I became the Technology Director for JMCSS 6 years ago, I inherited a very disjointed and poorly connected technology infrastructure. I recognized that in order for our system to begin the process of teaching 21st century skills we would have to address some fundamental concerns with our connectivity at the building level. Our district, like many others, had significant financial restraints and we had to look for funding opportunities. Fortunately for our district we were able to take advantage of the E-Rate program and we were able to completely overhaul our network in a 2 year timeframe instead of 5-7 years as our internal budgets allowed.

As a result of increasing our network capacity we were then able to begin the transformation of 21st century teaching and learning at our district. We are still in that process, but have made great strides in affording our students the opportunity to interact and learn with their peers inside our district, state, and globally. These opportunities would have been significantly delayed had the E-Rate program not been available to our district.

I am currently serving as Chairman of the Tennessee Education Technology Association (TETA), we have discussed the proposed changes at length and have agreed on the comments/suggestions listed below.

COMMENTS OF THE

TENNESSEE EDUCATIONAL TECHNOLOGY ASSOCIATION

The Tennessee Educational Technology Association (TETA) is an organization representing technology professionals and educational technology advocates from most of the schools districts in Tennessee.

In October of 2013, the Board of Directors met, reviewed many of the comments submitted to the FCC, and discussed the pending Federal Communications Commission Notice of Proposed Rulemaking to Modernize the Schools and Libraries Universal Service Mechanism, commonly referred to as "E-Rate."

As a result of that discussion, we are pleased to have the opportunity to submit comments in response to this NPRM in regard to several issues that we feel are important to the continued success of the important program.

We agree with the Commission and many other respondents that the program represents one of the most successful programs ever provided to support the important work of teachers and students in our schools. We further agree with the recognition that the program is at a crossroads and must be reformed to address the ever-changing landscape of 21st century technological needs for our schools.

To this end, we concur with the three goals proposed for the modernization of the program as set forth in the NPRM. It is critical that schools are ensured to have affordable access to broadband resources capable of digital learning. We also agree that the cost-effectiveness of the program should be maximized. Finally, it is painfully clear for our membership that streamlining the program is critical to the continued success of the program.

TETA's comments are summarized as follows:

1. The funding cap must be increased. We agree with SECA and majority of other respondents that permanent funding must be allocated to E-rate in order to meet the program objectives and demand arising from any program revisions.

   It is our opinion that for the program to achieve continued success, this cap must increase immediately to a minimum of 5 billion dollars. Further, the Commission should develop a mechanism to ensure appropriate growth of the fund to support the predictable future needs of the supported services.

   The funding must be sustainable versus a one-time allocation of funding. Equipment must be refreshed over time and it is critical that adequate funding is available to facilitate these activities and support the program.

2. TETA does not support the attachment of learning outcomes or test scores to the receipt of funding. TETA agrees with SECA that there is no reasonable correlation between these goals and the goals of the program.
3. TETA also opposes the use of devices to measure the use of specific broadband resources as these devices typically only provide a snapshot of utilization and provide viable information as to a "best value" decision by the school district.
4. TETA believes that dark and lit fiber should be treated equally.
5. While we concur that the heart of the program must be to provide broadband resources should receive Priority 1 status, TETA opposes the phasing out the eligibility of basic phone services, web hosting, internet access via cellular services, and basic maintenance.

Many of our members continue to be dependent on these services and we feel that it is necessary to the success of our districts to maintain the eligibility of these services.

We concur with many other respondents that paging services ae essentially obsolete and no longer require support.

6. TETA does not believe the definition of "Educational Purposes" should be made more restrictive.
7. TETA supports the concept of equitable distribution of funds but believes the discount calculation and application process should be left to the discretion of the school district as to whether to apply by school or district wide.

   TETA fervently oppose any budgeted approach for E-rate funding based on per-student or per-building funding or the concept of funding caps. Consequently, we concur with SECA's opinion that this will not be efficient and will result in additional unspent funding and oppose all proposals such as those proposed by Funds for Learning that "cap" annual funding.

   Further, we also are concerned that any change in the program that would appear to "guarantee" funding on an annual basis will result in a scenario where other budget resources are supplanted.

8. TETA supports streamlining efforts so long as those efforts do not further complicate the application process for the applicant.

   Specifically:

   a.   TETA supports the option to file all forms electronically but does not support a requirement to do so.
   b.   TETA supports increased transparency in the process by USAC so that districts may keep better track of the status of applications and appeals that are in process.
   c.   TETA does not believe that it would be helpful to require applicants to publish contracts and bidding documents.
   d.   TETA supports the use of a single 471 for multi-year contracts as an effort to streamline the application process.
   e.   While TETA believes that speeding the review of applications, commitment decisions, and funding disbursements is an admirable goal, we do not support the elimination or limitation of current review or appeals processes.
   f.   TETA has reservations regarding the simplification of the Eligible Services List. It has been the experience of our membership that previous efforts have resulted in the elimination of text critical to the appropriate development of workable projects and have served to unduly limit the stated goals of the program.

g. **TETA believes that streamlining of the appeals process would be advantageous but we would not support efforts to limit the options for oversight that currently exist.**

9. **We support the remittance of BEAR payments directly to applicants as a simple but important streamlining measure.**
10. **TETA strongly opposes a 10-year document retention policy. We find the proposal counterproductive to the goal of simplifying the burden on the applicant and brings no value to program processes.**
11. **TETA does not support the requirement that "a person of authority" sign all applications. In many of our districts, this requirement might cause delays or missed deadlines as "persons of authority" are frequently unavailable or have responsibilities that would limit their availability to sign applications. Further, in most districts, the expertise in the E-rate application process is delegated to others than those in "authority."**
12. **We agree that CIPA device definitions and regulations should be revised. We believe that the off-campus use of school owned devices and the on-campus use of non-school owned devices is quickly becoming a necessary extension of the educational environment.**

    We support the concept of CIPA compliance for non-school owned device but do not support the necessity of CIPA regulatory compliance at this time as there is no cost-effective, practical method to manage such regulatory requirements.

    Further, TETA supports the need for CIPA compliance of school-owned equipment used outside of the network but our membership is concerned about the cost of the appropriate management resources. If this becomes a regulatory requirement, we would hope that the Commission would ensure that the products required would be eligible for support.

    The Tennessee Educational Technology Association wants to thank the Commission for the opportunity to provide comments material to the Notice of Proposed Rules Making. We respectfully request that the Federal Communications Commission adopt an Order that supports the recommendations set forth in this document.

I personally agree with all of these comments and thank you for the opportunity to be heard and will be glad to assist in any other way with this process!

Respectfully submitted,

Chuck Jones
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